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**CONSERVATION & PROTECTION OF MARINE LIFE**

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January 17, 2025

The Honorable Jeffery D. Hildebrand, Chairman  
Texas Parks and Wildlife Commission  
4200 Smith School Road  
Austin, Texas 78744

Dear Chairman Hildebrand,

CCA Texas supports the proposal amendments to 31 TAC §58.11 and §58.30, concerning the Statewide Oyster Fishery Proclamation. These amendments represent an important step forward in oyster fishery management and the continued advancement of oyster reef restoration.

The introduction of Certificates of Location (CoLs) specifically for restoration purposes, distinct from those for harvest, reflects a significant advancement in managing oyster resources. This provision ensures that restoration projects remain dedicated solely to the recovery and enhancement of natural oyster populations. By prohibiting harvesting from restoration-designated CoLs and restricting oyster movement, the amendments create a framework that balances the utilization of CoLs for restoration and previously established CoLs for commercial harvest.

The amendments include a few key provisions that should result in successful outcomes for future restoration projects, including clarifying language for the definition and use of cultch, altering the definition of "natural oyster bed" for consistency with Parks and Wildlife Code §76.001, providing 15-yr terms as previously established with commercial CoLs, allowing non-harvest activities for monitoring, and adaptive management strategies following unforeseen damaging phenomena.

Additionally, the amendments enhance transparency and optimize public engagement, mirroring the process utilized for Commercial Oyster Mariculture. These changes ensure that stakeholders, including conservation groups and local communities, can actively participate in decision-making processes related to restoration projects.

The proposed amendments to 31 TAC §58.11 and §58.30 represent a well-considered regulatory framework that supports the ecological and economic sustainability of Texas's coastal ecosystems. By prioritizing oyster restoration, the regulation leverages the immense benefits oysters provide to water quality, biodiversity, shoreline protection, and carbon sequestration. Moving forward, we encourage continued collaboration with stakeholders to ensure the long-term success of these restoration efforts. To that end, CCA Texas has earmarked \$5 million specifically for oyster reef restoration and intends on utilizing a significant degree of the funds under the CoLs umbrella when possible.

Again, CCA Texas strongly supports these amendments and commends the Texas Parks and Wildlife Department (TPWD) for their commitment to ecological stewardship. Thank you for empowering TPWD staff to develop a thoughtful and robust program and thank you for your leadership through this regulatory process.

Respectfully,

Shane Bonnot  
CCA Texas Advocacy Director

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